

## **EXHIBIT 2**

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**From:** Tanck, Paul  
**Sent:** Thursday, August 09, 2012 8:26 PM  
**To:** Espinoza, Gilberto E (35802); Schapira, Lisa; Balber, Scott  
**Cc:** De Bruin, David L; Schmitt, Marshall J (35828); Nyenhuis, Christopher E (12765); Patti, Jodi K (15419); Stocco, Chantelle W (12523); Tanck, Paul  
**Subject:** RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Gil.

As you know, we spent the better part of an hour today trying to work together on a reasonable number of depositions as well as a reasonable schedule for these depositions. Unfortunately, we were unable to reach a resolution. I suggest we give it one more try first thing tomorrow morning. It is unreasonable to want to take 10 depositions in 4 days across 4 states. Please consider reducing the number of depositions to the 4 or 5 necessary depositions that Defendants require. If this is not amenable, please let us know immediately so we can move forward with our request for a protective order.

I will be available as early as 7 am CDT to discuss.

Thanks.

Paul

-----Original Message-----

**From:** Espinoza, Gilberto E (35802) [mailto:geespinoza@michaelbest.com]  
**Sent:** Thursday, August 09, 2012 7:48 PM  
**To:** Schapira, Lisa; Balber, Scott; Tanck, Paul  
**Cc:** De Bruin, David L; Schmitt, Marshall J (35828); Nyenhuis, Christopher E (12765); Patti, Jodi K (15419); Stocco, Chantelle W (12523); Tanck, Paul  
**Subject:** RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Paul,

Moving Rybacki to Monday will not provide sufficient time to cover her and the 30(b)(6) topics in one day. If you cannot have another attorney cover her deposition on the 21st, then we can agree to move her deposition to the following week if you agree to produce the unredacted Verizon of the spreadsheet by Friday, July 24.

Gil

Gilberto Espinoza  
geespinoza@michaelbest.com  
T. 312.596.5802

-----Original Message-----

**From:** Tanck, Paul [PTanck@chadbourne.com]  
**Received:** Thursday, 09 Aug 2012, 18:17  
**To:** Espinoza, Gilberto E (35802) [geespinoza@michaelbest.com]; Schapira, Lisa [LSchapira@chadbourne.com]; Balber, Scott [SBalber@chadbourne.com]  
**CC:** De Bruin, David L [DLDebruin@michaelbest.com]; Schmitt, Marshall J (35828) [mjschmitt@michaelbest.com]; Nyenhuis, Christopher E (12765) [cenyenhuis@michaelbest.com]; Patti, Jodi K (15419) [JKPatti@michaelbest.com]; Stocco, Chantelle W (12523) [CWStocco@michaelbest.com]; Tanck, Paul [PTanck@chadbourne.com]  
**Subject:** RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Gil,

On August 21st I will be attending the third party deposition that your firm subpoenaed in Littleton, Massachusetts.

We could agree to do Rybacki and the Rockwell 30(b)(6) on Monday August 20 in Milwaukee back to back. We are amenable to starting the day at 7am and going for 11 or 12 hours if necessary.

Please note that the last flight from Milwaukee to Boston is 8:20 pm, so we will need to conclude the depositions in sufficient time so I can make that flight.

Please let me know in the next 30 minutes.

Best,

Paul

-----Original Message-----

From: Espinoza, Gilberto E (35802) [mailto:geespinoza@michaelbest.com]  
Sent: Thursday, August 09, 2012 6:58 PM  
To: Tanck, Paul; Schapira, Lisa; Balber, Scott  
Cc: De Bruin, David L; Schmitt, Marshall J (35828); Nyenhuis, Christopher E (12765); Patti, Jodi K (15419); Stocco, Chantelle W (12523)  
Subject: RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Paul:

We'll agree to move the Rule 30(b)(6) to August 20 in Milwaukee if you agree to do Rybacki on the 21st in Milwaukee.

Call me at 312.596.5802.

Thanks,

Gil

Gilberto Espinoza  
geespinoza@michaelbest.com  
T. 312.596.5802

-----Original Message-----

From: Tanck, Paul [PTanck@chadbourne.com]  
Received: Thursday, 09 Aug 2012, 15:06  
To: Tanck, Paul [PTanck@chadbourne.com]; Espinoza, Gilberto E (35802) [geespinoza@michaelbest.com]; Schapira, Lisa [LSchapira@chadbourne.com]; Balber, Scott [SBalber@chadbourne.com]  
CC: De Bruin, David L [DLDebruin@michaelbest.com]; Schmitt, Marshall J (35828) [mjschmitt@michaelbest.com]; Nyenhuis, Christopher E (12765) [cenyenhuis@michaelbest.com]; Patti, Jodi K (15419) [JKPatti@michaelbest.com]; Stocco, Chantelle W (12523) [CWStocco@michaelbest.com]  
Subject: RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Gil,

I tried calling you at 3pm CDT and got your voicemail.

Are you available?

Thanks,

Paul

Paul J. Tanck  
Chadbourn & Parke LLP  
30 Rockefeller Plaza, New York, NY 10112 tel 212-408-1116 | fax 212-541-5369  
ptanck@chadbourn.com<mailto:ptanck@chadbourn.com> | <http://www.chadbourn.com>  
vCard: <http://www.chadbourn.com/vcard/ptanck.vcf>

Please consider the environment before printing this email.

From: Tanck, Paul

Sent: Thursday, August 09, 2012 1:16 PM

To: 'Espinoza, Gilberto E (35802)'; Schapira, Lisa; Balber, Scott

Cc: De Bruin, David L; Schmitt, Marshall J (35828); Nyenhuis, Christopher E (12765); Patti, Jodi K (15419); Stocco, Chantelle W (12523)

Subject: RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Gilberto,

I will call you at 3 p.m. CDT.

Paul J. Tanck  
Chadbourn & Parke LLP  
30 Rockefeller Plaza, New York, NY 10112 tel 212-408-1116 | fax 212-541-5369  
ptanck@chadbourn.com<mailto:ptanck@chadbourn.com> | <http://www.chadbourn.com>  
vCard: <http://www.chadbourn.com/vcard/ptanck.vcf>

Please consider the environment before printing this email.

From: Espinoza, Gilberto E (35802) [mailto:geespinoza@michaelbest.com]

Sent: Thursday, August 09, 2012 1:09 PM

To: Tanck, Paul; Schapira, Lisa; Balber, Scott

Cc: De Bruin, David L; Schmitt, Marshall J (35828); Nyenhuis, Christopher E (12765); Patti, Jodi K (15419); Stocco, Chantelle W (12523)

Subject: RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Paul,

See attached letter and acknowledge receipt of the same.

We are unavailable to meet and confer at 5:00 P.M. CDT today regarding the deposition notices referenced in your August 8, 2012, letter. We are available today at 3:00 P.M. CDT or tomorrow any time after 11:30 A.M. CDT. Please let me know what time works best for you.

Sincerely,

Gil Espinoza

From: Tanck, Paul [mailto:PTanck@chadbourn.com]  
Sent: Wednesday, August 08, 2012 6:29 PM  
To: Espinoza, Gilberto E (35802); Schapira, Lisa; Balber, Scott; Tanck, Paul  
Cc: De Bruin, David L; Schmitt, Marshall J (35828); Nyenhuis, Christopher E (12765); Patti, Jodi K (15419); Stocco, Chantelle W (12523)

Subject: RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Gilberto,

Please see attached.

Paul J. Tanck  
Chadbourne & Parke LLP  
30 Rockefeller Plaza, New York, NY 10112 tel 212-408-1116 | fax 212-541-5369  
ptanck@chadbourne.com<mailto:ptanck@chadbourne.com> | <http://www.chadbourne.com>  
vCard: <http://www.chadbourne.com/vcard/ptanck.vcf>

Please consider the environment before printing this email.

From: Espinoza, Gilberto E (35802) [mailto:geespinoza@michaelbest.com]  
Sent: Tuesday, August 07, 2012 2:59 PM  
To: Schapira, Lisa; Balber, Scott; Tanck, Paul  
Cc: De Bruin, David L; Schmitt, Marshall J (35828); Nyenhuis, Christopher E (12765); Patti, Jodi K (15419); Stocco, Chantelle W (12523)  
Subject: RE: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Counsel:

Please see attached Amended Notice of Subpoena and acknowledge receipt of the same.

Sincerely,

Gil Espinoza

From: Espinoza, Gilberto E (35802)  
Sent: Thursday, July 26, 2012 6:11 PM  
To: LSchapira@chadbourne.com<mailto:LSchapira@chadbourne.com>;  
SBalber@chadbourne.com<mailto:SBalber@chadbourne.com>;  
PTanck@chadbourne.com<mailto:PTanck@chadbourne.com>  
Cc: De Bruin, David L; Bob@WCC-IP.com<mailto:Bob@WCC-IP.com>; Schmitt, Marshall J (35828);  
Mike@WCC-IP.com<mailto:Mike@WCC-IP.com>; walter@wcc-ip.com<mailto:walter@wcc-ip.com>;  
Nyenhuys, Christopher E (12765)  
Subject: Rockwell Automation v. WAGO Corporation; Case No. 3:10-cv-718 wmc

Counsel:

Please see attached notice of subpoena and confirm receipt of the same.

Sincerely,

Gil Espinoza

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Gilberto E. Espinoza  
Attorney at Law  
Michael Best & Friedrich LLP  
Two Prudential Plaza  
180 North Stetson Avenue, Suite 2000  
Chicago, Illinois 60601

[<http://www.whdlaw.com/phone.gif>]: 312.596.5802 | [<http://www.whdlaw.com/fax.gif>] :  
312.222.0818 | [<http://www.whdlaw.com/email.gif>] :  
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